

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street - 10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

BY EMAIL AND ECF

The Honorable Judge Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Morrow-Wu et al
23 Cr. 90 (AKH)

Dear Judge Hellerstein:

With the consent of the Government and counsel for Shangzhen Wu, I write to request an adjournment of the September 20, 2023, status conference. Matthew Wu has a previously scheduled oncology appointment on September 20 at 3:00 P.M. that would conflict with the time set by the Court. See Exhibit A.

I respectfully request an adjournment of the status conference for 30 days. All parties are available to proceed on October 19, 2023. This adjournment is requested in light of Matthew Wu's conflicting medical appointment and will give the parties additional time to discuss a pretrial resolution prior to setting motions and trial deadlines.

As mentioned above, all parties consent to a 30-day adjournment and are available on October 19, 2023. If this date does not work for the Court, the parties can confer and propose additional days in late October and early November.

The Government requests exclusion of time until the date of the next status conference. The defense consents.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ _____
Zawadi S. Baharanyi
Assistant Federal Defender
(917) 612-2753

cc: AUSA Jerry Fang

SO ORDERED:

HONORABLE ALVIN K. HELLERSTEIN
United States District Judge